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15 *Attorneys for Defendant Elon Musk*

12 **UNITED STATES DISTRICT COURT**
13 **CENTRAL DISTRICT OF CALIFORNIA**

15 VERNON UNSWORTH,

16 Plaintiff,

17 vs.

18 ELON MUSK,

19 Defendant.

Case No. 2:18-cv-08048

Judge: Hon. Stephen V. Wilson

**DECLARATION OF ALEX B. SPIRO
IN SUPPORT OF JOINT
STIPULATION TO RESCHEDULE
THE TRIAL DATE**

Complaint Filed: September 17, 2018

Trial Date: October 22, 2019

Requested Trial Date: December 2, 2019

1 **I, Alex B. Spiro, declare as follows:**

2 1. I am a member of the bar of the state of New York and a partner at
3 Quinn Emanuel Urquhart & Sullivan, LLP, attorneys for Defendant Elon Musk. I
4 have been admitted *pro hac vice* by the Court in this action. I make this declaration
5 of personal, firsthand knowledge, and if called and sworn as a witness, I could and
6 would testify competently thereto.

7 2. I submit this declaration in support of the parties Joint Stipulation to
8 Reschedule the Trial Date to December 2, 2019.

9 3. On or about May 7, 2019, Quinn Emanuel was retained as lead trial
10 counsel for Mr. Musk in the above titled action. I filed an application to appear *Pro*
11 *Hac Vice* in this action on behalf of Mr. Musk on May 13, 2019 (DKT #44). The
12 Court granted this application on May 14, 2019 (DKT #47).

13 4. Prior to being retained by Mr. Musk, I had been serving as lead trial
14 counsel in a criminal action in New York, which action had already been set for trial
15 in conflict with the October 22, 2019 trial date presently scheduled for this matter.

16 5. The action, titled *USA v. Owens, et al.*, 1:18-cr-00693-RMB (known as
17 the Panama Papers case), is set to begin trial on October 22, 2019 in the United
18 States District Court for the Southern District of New York. I am representing
19 Defendant Harald Joachim Von Der Goltz, who is facing charges of wire fraud,
20 conspiracy to commit tax evasion, and money laundering conspiracy, among other
21 charges. This trial is expected to last three weeks.

22 6. I would be prepared to try this action starting on December 2, 2019.
23

24 I declare under penalty of perjury under the laws of the State of California that
25 the foregoing is true and correct and that this document was executed in New York
26 City, New York.
27
28

1 DATED: June 5, 2019

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3 

4 By: _____
5 Alex B. Spiro